

EXHIBIT 1

From: Park, Ryuk <RPark@winston.com>
Sent: Monday, August 28, 2023 3:27 PM
To: Werner, Tom
Cc: Winston-Micron-Netlist; andrea@wsfirm.com; ce@wsfirm.com; wh@wsfirm.com; ~Baxter, Samuel; jtruelove@mckoolsmith.com; #Netlist-Micron [Int]
Subject: RE: Netlist v. Micron, No. 22-cv-203 (E.D. Tex.) - Inspection Prints

Tom,

We are still waiting for the Court to issue an order regarding the August 22 hearing. That being said, I understand from attending the hearing that the Court is likely ordering an additional 500 pages of source code print outs in addition to the amount specified in the protective order. Are you requesting a production of all power points, pdfs and excel files located on the source code computer pursuant to Section 10.xiii. of the protective order?

Jason Sheasby sent an email on August 22—before the Court issued an order regarding printouts—stating “Please produce pursuant to the protective order all power points and pdfs on the source code computer.” And then Annita (who was not at the hearing) sent an email the same day stating “The source code computer also included Excel spreadsheets. Please produce those as well.” If you are maintaining those requests now that the hearing has concluded, **please confirm that you are requesting a production of all power points, pdfs and excel files located on the source code computer material pursuant to Section 10.xiii. of the protective order.**

Ryuk

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**WINSTON
& STRAWN**
LLP

From: Werner, Tom <TWerner@irell.com>
Sent: Monday, August 28, 2023 2:02 PM
To: Park, Ryuk <RPark@winston.com>
Cc: Winston-Micron-Netlist <Winston-Micron-Netlist@winston.com>; andrea@wsfirm.com; ce@wsfirm.com; wh@wsfirm.com; ~Baxter, Samuel <sbaxter@mckoolsmith.com>; jtruelove@mckoolsmith.com; #Netlist-Micron [Int] <Netlist-Micron@irell.com>
Subject: RE: Netlist v. Micron, No. 22-cv-203 (E.D. Tex.) - Inspection Prints

Ryuk,

Micron is in contempt of the Protective Order, apparently intentionally so. Given the clear requirements of the Protective Order, and Micron's silence, there seems no need for any meet and confer before we seek appropriate relief.

Very truly yours,

Thomas C. Werner, Esq.
 Discovery Counsel
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 1800 Avenue of the Stars
 Suite 900
 Los Angeles, CA 90067-4276
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From: Werner, Tom <TWerner@irell.com>
Sent: Friday, August 25, 2023 8:45 AM
To: Park, Ryuk <RPark@winston.com>
Cc: Winston-Micron-Netlist <Winston-Micron-Netlist@winston.com>; andrea@wsfirm.com; ce@wsfirm.com; wh@wsfirm.com; ~Baxter, Samuel <sbaxter@mckoolsmith.com>; jtruelove@mckoolsmith.com; #Netlist-Micron [Int] <Netlist-Micron@irell.com>
Subject: RE: Netlist v. Micron, No. 22-cv-203 (E.D. Tex.) - Inspection Prints

Ryuk,

Micron's failure to deliver Netlist's August 16 print request violates the Protective Order, yet another example of why this is an exceptional case.

As you're aware, the request below regarding documents that Micron improperly designated as Source Code has been superseded in light of the Court's directives at the August 22 hearing, about which we have emailed you separately.

Very truly yours,

Thomas C. Werner, Esq.
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From: Werner, Tom <TWerner@irell.com>
Sent: Thursday, August 17, 2023 8:18 AM
To: Park, Ryuk <RPark@winston.com>
Cc: Winston-Micron-Netlist <Winston-Micron-Netlist@winston.com>; andrea@wsfirm.com; ce@wsfirm.com; wh@wsfirm.com; ~Baxter, Samuel <sbaxter@mckoolsmith.com>; jtruelove@mckoolsmith.com; #Netlist-Micron [Int] <Netlist-Micron@irell.com>
Subject: Netlist v. Micron, No. 22-cv-203 (E.D. Tex.) - Inspection Prints

Ryuk,

I'm following up on Annita Zhong's requests to you yesterday to provide printouts from the review computer and virtual machine. Please provide a listing of those files correlated to the Bates numbers of the prints.

Annita also requested production of documents that Micron improperly designated as Source Code, with redactions if Micron believes that is legitimately warranted. Please confirm when these will be produced.

Very truly yours,

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